

EXHIBIT B - Plaintiff's Complaint



TO: Sue Carlson
Target Corporation
1000 Nicollet Mall
Minneapolis, MN 55403-2542

RE: **Process Served in Nevada**
FOR: Target Corporation (Domestic State: MN)

**Service of Process
Transmittal**
11/20/2020
CT Log Number 538629116

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION: Ruby Garcia Sanchez, a Minor, by and through her parent and natural guardian Karla Garcia Gomez, Pltf. vs. Target Corporation, LLC, etc., et al., Dfts.

DOCUMENT(S) SERVED: -

COURT/AGENCY: None Specified
Case # A20824961C

NATURE OF ACTION: Personal Injury - Failure to Maintain Premises in a Safe Condition

ON WHOM PROCESS WAS SERVED: C T Corporation System, Carson City, NV

DATE AND HOUR OF SERVICE: By Process Server on 11/20/2020 at 13:05

JURISDICTION SERVED : Nevada

APPEARANCE OR ANSWER DUE: None Specified

ATTORNEY(S) / SENDER(S): None Specified

ACTION ITEMS: CT has retained the current log, Retain Date: 11/20/2020, Expected Purge Date: 11/25/2020
Image SOP
Email Notification, Non Employee Litigation Target gl.legal@target.com

SIGNED: C T Corporation System
ADDRESS: 1999 Bryan St Ste 900
Dallas, TX 75201-3140

For Questions: 877-564-7529
MajorAccountTeam2@wolterskluwer.com

Electronically Issued
11/17/2020 3:51 PM

1 **SUMM**
2 TYLER J. WATSON, ESQ.
3 Nevada Bar No. 11735
4 BIANCA V. GONZALEZ
5 Nevada Bar No. 14529
6 KRAVITZ, SCHNITZER & JOHNSON, CHTD.
7 8985 South Eastern Avenue, Suite 200
8 Las Vegas, Nevada 89123
9 Telephone: (702) 362-6666
10 Facsimile: (702) 362-2203
11 tjwatson@ksjattorneys.com
12 bgonzalez@ksjattorneys.com
13 *Attorneys for Plaintiff,*
14 *Ruby Garcia*

8
9 **DISTRICT COURT**

10 **CLARK COUNTY, NEVADA**

11 **CASE NO: A-20-824961-C**

12 Case No.:

13 Dept. No.: Department 2

14 **SUMMONS - CIVIL**

15 RUBY GARCIA SANCHEZ, a Minor, by and
16 through her parent and natural guardian KARLA
17 GARCIA GOMEZ,

18 Plaintiff,

19 vs.

20 TARGET CORPORATON, LLC a foreign
21 corporation,
22 DOES I through X, inclusive, and ROE
23 CORPORATIONS I through X, inclusive,

24 Defendants.

25 TO DEFENDANT: TARGET CORPORATION, LLC
26 c/o Registered Agent
27 CT Corporation System
28 701 S. Carson St. Suite 200
Carson City, NV 89701

29 **NOTICE! YOU HAVE BEEN SUED. THE COURT MAY DECIDE AGAINST
YOU WITHOUT YOUR BEING HEARD UNLESS YOU RESPOND WITHIN 20 DAYS.
READ THE INFORMATION BELOW.**

30 TO THE DEFENDANT(S): A civil Complaint has been filed by the Plaintiff(s) against
31 you the relief set forth in the Complaint.

32 1. If you intend to defend this lawsuit, within 20 days after this Summons is served

KRAVITZ, SCHNITZER & JOHNSON, CHTD.
8985 SO. EASTERN AVENUE, SUITE 200
LAS VEGAS, NEVADA 89123
TEL - (702) 362-2203; FAX - (702) 362-2203

1 on you, exclusive of the day of service, you must do the following:

2 (a) File with the Clerk of this Court, whose address is shown below, a formal
3 written response to the Complaint in accordance with the rules of the Court, with the appropriate
4 filing fee.

5 (b) Serve a copy of your response upon the attorney whose name and address
6 is shown below.

7 2. Unless you respond, your default will be entered upon application of the
8 Plaintiff(s) and failure to so respond will result in a judgment of default against you for the relief
9 demanded in the Complaint, which could result in the taking of money or property or other relief
10 requested in the Complaint.

11 3. If you intend to seek the advice of an attorney in this matter, you should do so
12 promptly so that your response may be filed on time.

13 4. The State of Nevada, its political subdivisions, agencies, officers, employees,
14 board members, commission members and legislators each have 45 days after service of this
15 Summons within which to file an Answer or other responsive pleading to the Complaint.

16 DATED this 17th date of November, 2020.

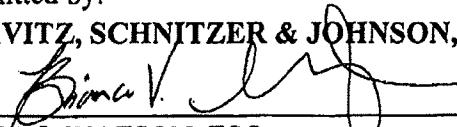
17 STEVEN D. GRIERSON
18 CLERK OF THE COURT

19 By:  11/17/2020

20 DEPUTY CLERK
21 Regional Justice Center
22 200 Lewis Ave.
23 Las Vegas, NV 89155
24 Marie Kramer

25 Submitted by:

26 KRAVITZ, SCHNITZER & JOHNSON, CHTD.

27 
28 TYLER J. WATSON, ESQ.

29 Nevada Bar No. 11735

30 BIANCA V. GONZALEZ, ESQ.

31 Nevada Bar No. 14529

32 8985 S. Eastern Ave., Ste. 200

33 Las Vegas, NV 89123

34 *Attorneys for Plaintiff, Ruby Garcia*

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Electronically Filed
11/17/2020 3:51 PM
Steven D. Grierson
CLERK OF THE COURT

Steven D. Grierson

1 COMP
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13 Attorneys for Plaintiff,
14 Ruby Garcia

CASE NO: A-20-824961-C
Department 2

8 DISTRICT COURT
9

10 CLARK COUNTY, NEVADA

11 RUBY GARCIA SANCHEZ, a Minor, by and
12 through her parent and natural guardian KARLA
13 GARCIA GOMEZ,

Case No.:

Dept. No.:

14 Plaintiff,

COMPLAINT

15 vs.
16 TARGET CORPORATON, LLC a foreign
17 corporation,
18 DOES I through X, inclusive, and ROE
CORPORATIONS I through X, inclusive,
19 Defendants.

Arbitration Exempt
Claim Exceeds \$50,000

21 Plaintiff, RUBY GARCIA SANCHEZ, by and through her attorneys of record, KRAVITZ,
22 SCHNITZER & JOHNSON, CHTD., states, asserts, and alleges against Defendant, TARGET
23 CORPORATON, LLC as follows:
24

25 / / /
26 / / /
27 / / /
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1 **JURISDICTIONAL ALLEGATIONS**

2 1. Plaintiff, RUBY GARCIA SANCHEZ, a Minor, by and through her parent and
3 natural guardian KARLA GARCIA GOMEZ (hereinafter "Plaintiff") is and was, at all times
4 relevant to the proceedings, a resident of Clark County, Nevada.

5 2. Defendant, TARGET CORPORATON, LLC (hereinafter "TARGET") is and was,
6 at all times relevant to these proceedings, a Minnesota Corporation duly licensed to conduct
7 business in the State of Nevada.

8 3. Defendants DOE 1 THROUGH 10 and ROE CORPORATIONS 1 THROUGH 20,
9 are individuals, associations, corporations, partnerships or other entities which are employees,
10 employers, agents, servants, masters, owners, controllers, partners, or in association with
11 TARGET and/or have in some way caused or contributed to Plaintiff's damages as herein alleged.
12 The true names or capacities, whether individual, corporate, associate or otherwise, are unknown
13 to Plaintiff. Plaintiff alleges each Defendant designated herein as a DOE and/or ROE is
14 responsible in some manner for the events and happenings referred to in this Complaint and
15 negligently caused injury and damages to Plaintiff. Plaintiff will ask leave of Court to amend this
16 Complaint to insert the true names and capacities of DOES 1 THROUGH 10 and ROE
17 CORPORATIONS 1 THROUGH 20 to include those true names and charging allegations when
18 they are ascertained.

19 **GENERAL ALLEGATIONS**

20 4. Plaintiff repeats and realleges the allegations contained in Paragraphs 1 through 3,
21 above, and incorporates the same by reference as though fully set forth herein.

22 5. On or about March 7, 2020, Plaintiff was visiting Target with her grandmother and
23 two uncles.

24 6. While on Target's premises, Plaintiff was placed in the seat of a shopping cart in
25 order to shop around the store with her family.

26 7. While being pushed in the cart, Plaintiff's cart came in contact with a store sign.

8. The store sign, not being affixed or weighed down, became unstable and fell upon Plaintiff's face resulting in several lacerations.

FIRST CAUSE OF ACTION
PREMISES LIABILITY
(Against all Defendants)

9. Plaintiff repeats and realleges the allegations contained in Paragraphs 1 through 8, above, and incorporates the same by reference as though fully set forth herein.

10. At all times relevant, Defendants owed a duty of reasonable care to its customers and their families, including Plaintiff, to keep a safe premises.

11. Defendants breached this duty of reasonable care by failing to properly maintain its premises and allowing the aforementioned injury to Plaintiff's face.

12. As a direct and proximate cause of Defendants' breach, Plaintiff has suffered permanent disfigurement, harm and injury to her physical, psychological and mental health, in excess of \$15,000.00.

13. As a direct and proximate result of Defendants' conduct, it has been necessary to retain the services of an attorney to represent Plaintiff, and Plaintiff is therefore entitled to reasonable attorney fees to bring this suit.

SECOND CAUSE OF ACTION
NEGLIGENCE
(Against all Defendants)

14. Plaintiff repeats and realleges the allegations contained in Paragraphs 1 through 130, above, and incorporates the same by reference as though fully set forth herein.

15. At all times relevant, Defendants owed a duty of reasonable care to its customers and their families, including Plaintiff, to ensure all signs, fixtures, and the like are stable, secure, and properly affixed to prevent them from falling upon its customers at the slightest disturbance.

16. Defendants breached this duty of reasonable care by failing to properly install, erect, or maintain its fixtures and allowing the aforementioned injury to Plaintiff's face.

17. As a direct and proximate cause of Defendants' breach, Plaintiff has suffered permanent disfigurement, harm and injury to her physical, psychological and mental health, in excess of \$15,000.00.

18. As a direct and proximate result of Defendants' conduct, it has been necessary to retain the services of an attorney to represent Plaintiff, and Plaintiff is therefore entitled to reasonable attorney fees to bring this suit.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for judgment against Defendants, as follows:

1. General damages in excess of \$15,000.00;
2. Special damages in excess of \$15,000.00;
3. For reasonable attorneys' fees and costs of suit;
4. For prejudgment and post-judgment interest, and
5. For such other and further relief as this Court may deem just and proper under the circumstances.

DATED this 17th date of November, 2020

KRAVITZ, SCHNITZER
& JOHNSON, CHTD.

Bianca V. M. J.

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